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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY:

DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

July 2002 Grand Jury

10	UNITED STATES OF AMERICA,)	Criminal Case No. <u>02CR0333W</u>
11	Plaintiff,)	<u>I N D I C T M E N T</u>
12	v.)	<u>(Superseding)</u>
13	CHRISTIAN E. ESQUINO (1),)	Title 18, U.S.C., Secs. 38(a)(3)
14	LANCE Z. RICOTTA (2),)	and 38(a)(1)(C) - Conspiracy to
15	Defendants.)	Commit Fraud Involving an
16)	Aircraft; Title 18, U.S.C.,
17)	Sec. 1001(a)(3) - False Statements
18)	or Writing; Title 18, U.S.C.,
)	Sec. 38(a)(1)(C) - Fraud Involving
)	an Aircraft; Title 18, U.S.C.,
)	Sec. 32(a)(6) - Fraudulent
)	Communications Involving an
)	Aircraft; Title 18, U.S.C.,
)	Sec 2 - Aiding and Abetting

The grand jury charges:

INTRODUCTORY ALLEGATIONS

1. At various times material to this Indictment, the Federal Aviation Administration (FAA), was an agency of the United States, and did have jurisdiction to ensure the safety and airworthiness of domestic aircraft and those who flew on them, the FAA met this responsibility in part through the issuance of regulations regarding all aircraft within the United States.

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1 7. At various times material to this Indictment, defendant
2 CHRISTIAN E. ESQUINO was the vice president and part owner of Argentum
3 Air Corporation, which was incorporated in the State of California on
4 March 17, 1994.

5 8. At various times material to this Indictment, defendant
6 CHRISTIAN E. ESQUINO made the business and financial decisions for
7 Argentum Air Corporation's purchase of various aircraft from the
8 Mexican Government.

9 9. At various times material to this Indictment, defendant
10 LANCE Z. RICOTTA, was doing business as, LANCE Z. RICOTTA Aircraft
11 Sales and Wright Brothers Aviation.

12 10. At various times material to this Indictment, defendant
13 CHRISTIAN E. ESQUINO conducted business including the purchase and
14 sale of aircraft through the Aircraft R US Corporation, a Delaware
15 Corporation, incorporated on August 9, 1999, and in which CHRISTIAN
16 E. ESQUINO is the sole proprietor.

17 11. At various times material to this Indictment, defendant
18 CHRISTIAN E. ESQUINO was an owner and stockholder in Executive
19 Aviation Logistics (EAL), a fixed base operation, located at the Chino
20 Airport, in Chino California.

21 12. At various times material to this Indictment, defendant
22 CHRISTIAN E. ESQUINO employed defendant LANCE Z. RICOTTA as a pilot,
23 as well as conducting business with defendant LANCE Z. RICOTTA as an
24 associate.

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Count 1

CONSPIRACY TO COMMIT FRAUD INVOLVING AIRCRAFT

Beginning at a date unknown to the grand jury and continuing up to and including October 2001, within the Southern District of California, and elsewhere, in a matter within the jurisdiction of the Federal Aviation Administration, an agency of the United States, defendants CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA, in or affecting interstate or foreign commerce, did knowingly and intentionally conspire together and with each other and with other persons known and unknown to the grand jury to commit offenses against the United States, that is, knowingly and with intent to defraud make or uses any materially false writings, false entries, false certifications, and false records concerning aircraft.

MANNER AND MEANS OF THE CONSPIRACY

1. It was part of the conspiracy that defendants CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA provided an unidentified individual with blank logbooks for the purpose of creating false and fictitious logbooks for aircraft purchased from the Mexican government by Argentum Air Corporation.

2. It was further part of the conspiracy that defendants CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA provided an unidentified individual with Mexican aircraft tail numbers, Mexican airport codes, fuel range for particular aircraft and the correct number of letters and numbers contained in a standard Mexican pilot license, all for the purpose of creating false and fictitious logbooks for aircraft purchased from the Mexican government by Argentum Air Corporation.

3. It was further part of the conspiracy that defendant LANCE Z. RICOTTA obtained a counterfeit Mexican inspection stamp, which was

1 used to make entries in the fraudulently created logbooks, concerning
2 the airworthiness for aircraft engines, propellers and airframes, as
3 well as, certify completed 25, 50 and 100 hour aircraft inspections.

4 4. It was further part of the conspiracy that defendant
5 CHRISTIAN E. ESQUINO provided an unidentified individual with payment
6 for creating false and fictitious logbooks for aircraft purchased from
7 the Mexican government by Argentum Air Corporation.

8 5. It was further part of the conspiracy that defendants
9 CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA sold aircraft purchased from
10 the Mexican government by Argentum Air Corporation using the
11 fraudulently created logbooks as an accurate record of an aircraft's
12 total operating hours, of flights between Mexican airports by
13 particular pilots, as well as, a history of maintenance and inspection
14 records.

15 6. It was further part of the conspiracy that the new owners
16 of aircraft previously purchased from the Mexican government made
17 application to the Federal Aviation Administration for airworthiness
18 certificates relying on information taken from logbooks fraudulently
19 created by defendants CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA.

20 7. It was further part of the conspiracy that defendants
21 CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA changed and forged or caused
22 others to change and forge aircraft logbook entries, concerning an
23 aircraft's engine overhaul and inspection records, for aircraft
24 purchased by the defendants.

25 8. It was further part of the conspiracy that defendants
26 CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA sold aircraft containing
27 changed and forged engine overhaul and inspection records in an
28 aircraft's logbook.

9. It was further part of the conspiracy that defendant LANCE Z. RICOTTA purchased or caused others to purchase rubber stamps for FAA repair stations located throughout the United States and in foreign countries which were used to create false and fraudulent entries in aircraft logbooks.

10. It was further part of the conspiracy that defendant LANCE Z. RICOTTA purchased blank logbooks from a printing company which were used to create false and fraudulent aircraft logbooks.

OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, the following Overt Acts, among others were committed within the Southern District of California and elsewhere:

1. Between mid-February 1997 and up to and including March 11, 1997, in San Diego, California, defendants CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA caused false and fraudulent logbooks to be created with false entries for a Cessna 310 aircraft, Serial Number 2138, Mexican Tail Number XC-GAV and United States Tail Number N310CL.

2. Between mid-February 1997 and up to and including March 11, 1997, in San Diego, California, defendants CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA caused false and fraudulent logbooks to be created with false entries for a Cessna P210 aircraft, Serial Number 665, Mexican Tail Number XC-FUU and US Tail Number N567D.

3. Between mid-February 1997 and up to and including March 11, 1997, in San Diego, California, defendants CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA caused false and fraudulent logbooks to be created with false entries for a Cessna 310

1 aircraft, Serial Number 1680, Mexican Tail Number XC-DAW
2 and US Tail Number N310LH.

3 4. Between mid-February 1997 and up to and including March 11,
4 1997, in San Diego, California, defendants CHRISTIAN E.
5 ESQUINO and LANCE Z. RICOTTA caused false and fraudulent
6 logbooks to be created with false entries for a Cessna 310
7 aircraft, Serial Number 1656, Mexican Tail Number XC-FAP
8 and US Tail Number N310LP.

9 5. Between mid-February 1997 and up to and including March 11,
10 1997, in San Diego, California, defendants CHRISTIAN E.
11 ESQUINO and LANCE Z. RICOTTA caused false and fraudulent
12 logbooks to be created with false entries for a Cessna 310
13 aircraft, Serial Number 1886, Mexican Tail Number XC-FAR
14 and US Tail Number N38LH.

15 6. Between mid-February 1997 and up to and including March 11,
16 1997, in San Diego, California, defendants CHRISTIAN E.
17 ESQUINO and LANCE Z. RICOTTA caused false and fraudulent
18 logbooks to be created with false entries for a Cessna 210
19 aircraft, Serial Number 64159, Mexican Tail Number XC-GEB
20 and US Tail Number N210JM.

21 7. On or about February 24, 1997, defendants CHRISTIAN E.
22 ESQUINO and LANCE Z. RICOTTA sold a Cessna 210 aircraft,
23 Serial Number 64159, US Tail Number N210JM, as part of that
24 sale, the defendants delivered the false and fraudulently
25 created logbooks to the new owner of the Cessna 210
26 aircraft.

27 8. On or about November 20, 1998, the new owner for a Cessna
28 210 aircraft, Serial Number 64159, US Tail Number N210JM,

1 using information contained in the phoney logbooks created
2 by defendants CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA,
3 applied for an airworthiness certificate from the Federal
4 Aviation Administration

5 9. On or about March 12, 1997, defendants CHRISTIAN E. ESQUINO
6 and LANCE Z. RICOTTA sold a Cessna 310 aircraft, Serial
7 Number 1886, and US Tail Number N38LH, as part of the sale,
8 the defendants delivered the false and fraudulently created
9 logbooks to the new owner of the Cessna 310 aircraft.

10 10. On or about May 1, 1997, the new owner for a Cessna 210
11 aircraft, Serial Number 1886, and US Tail Number N38LH,
12 using information contained in the phoney logbooks created
13 by defendants CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA
14 applied for an airworthiness certificate from the Federal
15 Aviation Administration.

16 11. On or about May 16, 1997, defendants CHRISTIAN E. ESQUINO
17 and LANCE Z. RICOTTA sold a Cessna 310 aircraft, Serial
18 Number 1680, and US Tail Number N310LH, as part of the
19 sale, the defendants delivered the false and fraudulently
20 created logbooks to the new owner of the Cessna 310
21 aircraft.

22 12. On or about August 7, 1997, the new owner for a Cessna 310
23 aircraft, Serial Number 1680, and US Tail Number N310LH,
24 using information contained in the phoney logbooks created
25 by defendants CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA
26 applied for an airworthiness certificate from the Federal
27 Aviation Administration

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- 1 13. On or about May 12, 1997, defendants CHRISTIAN E. ESQUINO
2 and LANCE Z. RICOTTA sold a Cessna 310 aircraft, Serial
3 Number 1656, and US Tail Number N310LP, as part of the
4 sale, the defendants delivered the false and fraudulently
5 created logbooks to the new owner of the Cessna 310
6 aircraft.
- 7 14. On or about November 3, 1997, the new owner for a Cessna 210
8 aircraft, Serial Number 1656, and US Tail Number N310LP,
9 using information contained in the phoney logbooks created
10 by defendants CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA
11 applied for an airworthiness certificate from the Federal
12 Aviation Administration
- 13 15. On or about March 31, 1997, defendants CHRISTIAN E. ESQUINO
14 and LANCE Z. RICOTTA sold a Cessna P210 aircraft, Serial
15 Number 665, and US Tail Number N567D, as part of the sale,
16 the defendants delivered the false and fraudulently created
17 logbooks to the new owner of the Cessna P210 aircraft.
- 18 16. On or about April 9, 1997, the new owner a Cessna 210
19 aircraft, Serial Number 665, and US Tail Number N567D,
20 using information contained in the phoney logbooks created
21 by defendants CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA
22 applied for an airworthiness certificate from the Federal
23 Aviation Administration
- 24 17. On or about October 31, 1997, defendants CHRISTIAN E.
25 ESQUINO and LANCE Z. RICOTTA sold a Cessna 310 aircraft,
26 Serial Number 2138, and United States Tail Number N310CL,
27 as part of the sale, the defendants delivered the false and

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1 fraudulently created logbooks to the new owner of the
2 Cessna 310 aircraft.

3 18. On or about April 9, 1997, the new owner of a Cessna 310
4 aircraft, Serial Number 2138, and United States Tail Number
5 N310CL, using information contained in the phoney logbooks
6 created by defendants CHRISTIAN E. ESQUINO and LANCE Z.
7 RICOTTA applied for an airworthiness certificate from the
8 Federal Aviation Administration.

9 19. On or about May 19, 1997, in San Diego County, defendant
10 CHRISTIAN E. ESQUINO d.b.a., Argentum Air Corporation
11 purchased a Merlin IIIB aircraft from a seller in Ecuador,
12 and thereafter the aircraft was registered in the United
13 States under U.S. tail number N100CE and later changed to
14 N117CC.

15 20. Sometime after May 1997, but before March 2000, defendants
16 LANCE Z. RICOTTA and CHRISTIAN E. ESQUINO entered or caused
17 others to enter false and fraudulent information into the
18 Merlin IIIB (N117CC) logbooks which were then delivered to
19 the new owner in or about March 2000.

20 21. Sometime in March 1998, in San Diego County, defendant
21 CHRISTIAN E. ESQUINO d.b.a., Argentum Air Corporation
22 purchased a Cessna Conquest aircraft from a seller in
23 Mexico, and thereafter the aircraft was registered in the
24 United States under U.S. tail number N441CE and later
25 changed to N24PT.

26 22. Sometime after March 1998, but before January 12, 2000,
27 defendants LANCE Z. RICOTTA and CHRISTIAN E. ESQUINO
28 entered or caused others to enter false and fraudulent

1 information into the Cessna Conquest (N24PT) logbooks which
2 were then delivered to the new owner in or about January
3 2000.

4 23. On or about March 16, 1998, in San Diego California,
5 defendant CHRISTIAN E. ESQUINO caused a check in the amount
6 of \$19,000, to be delivered to defendant LANCE Z. RICOTTA,
7 for the purchase of an aircraft.

8 24. On or about March 16, 1998, in San Diego County, defendants
9 LANCE Z. RICOTTA and CHRISTIAN E. ESQUINO purchased a 1969
10 Piper Cherokee aircraft, US Tail Number N7933N, for
11 \$16,500.

12 25. Sometime after March 16, 1998, but before August 12, 1999,
13 defendants CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA
14 entered, or caused others to enter false and fraudulent
15 information into the Piper Cherokee's logbook, that is,
16 that an engine overhaul had been completed on September 9,
17 1982, and that an airworthiness inspection had been
18 completed on August 5, 1998, for the aircraft.

19 26. On or about August 12, 1999, in San Diego County,
20 defendants CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA sold
21 the Piper Cherokee aircraft for \$39,000, knowing that at
22 least two of the aircraft's logbook entries were false.

23 27. On or about March 16, 1998, in San Diego County, defendants
24 LANCE Z. RICOTTA and CHRISTIAN E. ESQUINO purchased a
25 Rockwell Commander 690B aircraft, US Tail Number N25CE, for
26 \$350,000.

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- 1 28. Sometime after March 16, 1999, but before June 2001,
2 defendants LANCE Z. RICOTTA and CHRISTIAN E. ESQUINO
3 entered or caused others to enter false and fraudulent
4 information into the Rockwell Commander's (N25CE) logbooks
5 which were then delivered to the new owner in or about June
6 2001.
- 7 29. On or about May 6, 2000, in San Diego, California,
8 defendant CHRISTIAN E. ESQUINO delivered or had others
9 deliver a check, in the amount of \$150,000 to defendant
10 LANCE Z. RICOTTA, for the purchase of an aircraft.
- 11 30. On or about May 23, 2000, defendant LANCE Z. RICOTTA wire
12 transferred \$150,000 to an escrow company for the purchase
13 of a 1966 Jet Commander aircraft, US Tail Number N382AA.
- 14 31. Sometime after May 23, 2000, but before August 20, 2001,
15 defendants CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA
16 entered, or caused others to enter false and fraudulent
17 information into the Jet Commander's logbook, that is, that
18 an engine overhaul was completed on both engines of the
19 aircraft in May 1978.
- 20 32. On or about July 21, 2001, in San Diego County, defendants
21 CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA sold the Jet
22 Commander aircraft for \$250,000, knowing that false and
23 fraudulent entries were made into the aircraft's logbook
24 concerning its engines.
- 25 33. Sometime in August 2001, in San Diego County, defendant
26 CHRISTIAN E. ESQUINO d.b.a., Aircraft R US Corporation and
27 utilizing Pan Pacific Jets, a corporation owned by his
28 brother, purchased a 1982 Piper Navajo aircraft from a

1 seller in Mexico, and thereafter the aircraft was
2 registered in the United States under U.S. tail number
3 N82PP.

4 34. Sometime after August 2001, but before October 2001,
5 defendants LANCE Z. RICOTTA and CHRISTIAN E. ESQUINO
6 entered or caused others to enter false and fraudulent
7 information into the Piper Navajo's logbooks, that is
8 information identifying it as a 1982 model aircraft when in
9 fact it was a 1976 Piper Navajo model.

10 All in violation of Title 18, United States Code, Sections 38(a)(3)
11 and 38(a)(1)(C).

12 Counts 2-22 & 25-32

13 FALSE STATEMENT OR WRITING AND AIDING AND ABETTING

14 1. Paragraphs 1 through 8 of the introductory allegations and
15 paragraphs 1 and 8 of the Manner and Means in Count 1 of this
16 Indictment are realleged and hereby incorporated by reference in
17 Counts 2-22 and 25-32 as though fully set forth herein.

18 2. Between mid-February 1997 and March 11, 1997, within the
19 Southern District of California and elsewhere, in a matter within the
20 jurisdiction of the Federal Aviation Administration, an agency of the
21 United States, defendants CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA
22 did knowingly and willfully make or cause others to make false,
23 fictitious and fraudulent statements and representations of material
24 fact, that is, by creating false logbooks for aircraft purchased from
25 the Mexican government, as set forth below, making false and
26 fraudulent statements in the aircraft's logbook entries, including
27 inserting false and fraudulent airworthiness stamps, for an aircraft's
28 engine, propeller and airframe, inserting false and fraudulent

1 inspection dates, inserting false flight log times and engine time for
2 the Mexican aircraft, as set forth below, knowing that such entries
3 were false, fraudulent and fictitious statements:

4	<u>Count</u>	<u>Mexican Tail #</u>	<u>Date & Logbook Entry</u>	<u>False Statement</u>
5	2	XC-GAV	03/19/91-Inspection Stamp	Fraudulent Stamp
6	3	XC-GAV	11/12/90-Inspection Stamp	Fraudulent Stamp
7	4	XC-GAV	07/28/90-Inspection Stamp	Fraudulent Stamp
8	5	XC-GAV	03/19/91-Inspection Stamp	Fraudulent Stamp
9	6	XC-GAV	02/24/94-Inspection Stamp	Fraudulent Stamp
10	7	XC-FUU	01/17/90-Flight Log and Engine Time	False Entry
11	8	XC-FUU	02/06/91-Flight Log and Engine Time	False Entry
13	9	XC-FUU	01/04/92-Flight Log and Engine Time	False Entry
14	10	XC-FUU	04/03/94-Flight Log and Engine Time	False Entry
16	11	XC-DAW	06/12/87-Inspection Stamp	Fraudulent Stamp
17	12	XC-DAW	01/03/88-Inspection Stamp	Fraudulent Stamp
18	13	XC-DAW	05/19/84-Inspection Stamp	Fraudulent Stamp
19	14	XC-DAW	03/03/83-Inspection Stamp	Fraudulent Stamp
20	15	XC-DAW	12/27/80-Flight Log and Engine Time	False Entry
21	16	XC-DAW	09/25/81-Flight Log and Engine Time	False Entry
22	17	XC-DAW	05/22/82-Flight Log and Engine Time	False Entry
23	18	XC-DAW	05/06/92-Flight Log and Engine Time	False Entry
24	19	XC-FAP	01/07/93-Inspection Stamp	Fraudulent Stamp
25	20	XC-FAP	06/04/93-Inspection Stamp	Fraudulent Stamp

1	21	XC-FAP	03/02/93-Inspection Stamp	Fraudulent Stamp
2	22	XC-FAP	10/10/93-Inspection Stamp	Fraudulent Stamp
3	25	XC-GEB	05/22/95-Inspection Stamp	Fraudulent Stamp
4	26	XC-GEB	12/20/81-Inspection Stamp	Fraudulent Stamp
5	27	XC-GEB	05/25/82-Inspection Stamp	Fraudulent Stamp
6	28	XC-GEB	11/10/82-Inspection Stamp	Fraudulent Stamp
7	29	XC-GEB	12/20/81-Flight Log and Engine Time	False Entry
8				
9	30	XC-GEB	05/25/82-Flight Log and Engine Time	False Entry
10	31	XC-GEB	01/19/83-Flight Log and Engine Time	False Entry
11				
12	32	XC-GEB	08/28/83-Flight Log and Engine Time	False Entry

13 All in violation of Title 18, United States Code, Section 1001(a)(3),
14 and Title 18, United States Code, Section 2.

15 Counts 33 - 35

16 FALSE STATEMENT OR WRITING AND AIDING AND ABETTING

17 1. Paragraphs 1 through 5 and 8 through 11 of the introductory
18 allegations and paragraphs 7 and 10 of the Manner and Means in Count 1
19 of this Indictment are realleged and hereby incorporated by reference
20 in Counts 33 through 35, as though fully set forth herein.

21 2. Between March 16, 1998 and August 12, 1999, in Counts 33 and
22 34, within the Southern District of California and elsewhere, in a
23 matter within the jurisdiction of the Federal Aviation Administration,
24 an agency of the United States, defendants CHRISTIAN E. ESQUINO and
25 LANCE Z. RICOTTA did knowingly and willfully make or cause others to
26 make false, fictitious and fraudulent statements and representations
27 of material fact, that is, by making fraudulent and false entries in
28 the logbook of 1969 Piper Cherokee, United States Serial

Number N7933N, as set forth below, knowing that such entries were false, fraudulent and fictitious statements:

<u>Count</u>	<u>US Tail #</u>	<u>Date & Logbook Entry</u>	<u>False Statement</u>
33	N7933N	9/9/82-Engine overhaul	False Entry
34	N7933N	8/5/98-Airworthiness Inspection	False Entry
35	N7933N	8/8/98-Re-certification of Transponder	False Entry

All in violation of Title 18, United States Code, Section 1001(a)(3), and Title 18, United States Code, Section 2.

Counts 36-37

FRAUD INVOLVING AIRCRAFT AND AIDING AND ABETTING

1. Paragraphs 1 through 5 and 8 through 11 of the introductory allegations and paragraphs 7 through 10 of the Manner and Means in Count 1 of this Indictment are realleged and hereby incorporated by reference in Counts 36 and 37 as though fully set forth herein.

2. Between March 16, 1998, and July 20, 2001, within the Southern District of California and elsewhere, in a matter within the jurisdiction of the Federal Aviation Administration, an agency of the United States, defendants CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA, in or affecting interstate or foreign commerce, did knowingly and with intent to defraud make or use a materially false writing, entry or certification concerning a 1966 Jet Commander aircraft, United States Tail Number N382AA, as set forth below:

<u>Count</u>	<u>US Tail #</u>	<u>Date & Logbook Entry</u>	<u>False Statement</u>
36	N382AA	5/16/78-Left Engine Overhaul	False Entry
37	N382AA	5/18/78- Right Engine Overhaul	False Entry

All in violation of Title 18, United States Code, Section 38(a)(1)(C), and Title 18, United States Code, Section 2.

2. Between March 16, 1999, and December 2000, within the Southern District of California and elsewhere, in a matter within the jurisdiction of the Federal Aviation Administration, an agency of the United States, defendants CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA, in or affecting interstate or foreign commerce, did knowingly and with intent to defraud make or use a materially false writing, entry or certification concerning a Rockwell Commander 690B aircraft, United States Tail Number N25CE, as set forth below:

<u>Count</u>	<u>US Tail #</u>	<u>Date & Logbook Entry</u>	<u>False Statement</u>
39	N25CE	6/2/84-Inspection Repair	False Entry/Stamp
40	N25CE	8/31/84-Inspection Repair	False Entry/Stamp
41	N25CE	6/19/86-Inspection Repair	False Entry/Stamp

All in violation of Title 18, United States Code, Section 38(a)(1)(C), and Title 18, United States Code, Section 2.

Counts 42-44

FRAUD INVOLVING AIRCRAFT AND AIDING AND ABETTING


1. Paragraphs 1 through 5 and 8 through 12 of the introductory allegations and paragraphs 7 through 10 of the Manner and Means in Count 1 of this Indictment are realleged and hereby incorporated by reference in Counts 42 and 44 as though fully set forth herein.

2. Between June 2001 and October 2001, within the Southern District of California and elsewhere, in a matter within the jurisdiction of the Federal Aviation Administration, an agency of the United States, defendants CHRISTIAN E. ESQUINO and LANCE Z. RICOTTA, in or affecting interstate or foreign commerce, did knowingly and with intent to defraud make or use a materially false writing, entry or certification concerning a Piper Navajo aircraft, United States Tail Number N82PP, as set forth below:


1	<u>Count</u>	<u>US Tail #</u>	<u>Date & Logbook Entry</u>	<u>False Statement</u>
2	42	N82PP	1/15/84-Inspection Repair	False Entry/Stamp
3	43	N82PP	6/7/85-Inspection Repair	False Entry/Stamp
4	44	N82PP	7/12/88-Inspection Repair	False Entry/Stamp
5	All in violation of Title 18, United States Code, Section 38(a)(1)(C),			
6	and Title 18, United States Code, Section 2.			

DATED: October 8, 2003.

A TRUE BILL:


Foreperson

12 CAROL C. LAM
United States Attorney

13
14 By: 
15 TIMOTHY D. COUGHLIN
Assistant U.S. Attorney